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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHINA ENERGY CORPORATION, a Nevada
corporation,

Plaintiff,

vs.

ALAN T. HILL, ELENA SAMMONS,
MICHAEL SAMMONS, THOMAS S.
VREDEVOOGD, TRUSTEE OF THE
KIMBERLY J. VREDEVOOGD TRUST UA
1007/2008, JUN HE, and RANDY DOCK
FLOYD,

Defendants.

CASE NO. 3:13-cv-00562-MMD-VPC

**STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR CHINA
ENERGY CORPORATION TO FILE ITS REPLY TO
MOTION TO DISMISS (DKT. NO. 212)**

(FIRST REQUEST)

1 Plaintiff, China Energy Corporation ("CEC"), by and through its counsel of record,
2 Gordon Silver and Ulmer & Berne LLP, and Defendant Michael Sammons, in proper person,
3 hereby stipulate and agree as follows:

4 1. Michael Sammons filed a Motion to Dismiss for Want of Jurisdiction (Dkt. No. 212) on
5 May 12, 2014. CEC's response is currently due on Thursday, May 29, 2014.

6 2. CEC has requested additional time to file its reply points and authorities. Therefore, the
7 parties stipulate and agree that CEC shall have up to and including Friday, June 6, 2014, in
8 which to file its Opposition to the Motion to Dismiss (Dkt. No. 212).


9 4. CEC has requested this extension in light counsel's obligations and deadlines in other
10 cases. This extension is not being requested for the purpose of delay.

11 5. This is the first stipulation regarding an extension of time for CEC to file its Opposition
12 to Michael Sammons's Motion to Dismiss (Dkt. No. 212).

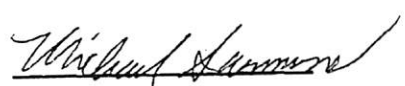
13
14 DATED this 22nd day of May, 2014.

DATED this 22nd day of May, 2014.

15 GORDON SILVER

16
17 By: 
18 Michael N. Feder
19 Justin J. Bustos
20 Anjali D. Webster
21 100 West Liberty Street
22 Suite 940
23 Reno, Nevada 89501

24 Attorneys for China Energy Corporation

17 By: 
18 Michael Sammons
19 15706 Seekers St
20 San Antonio, TX 78255

21 Defendant in Proper Person

ORDER

Pursuant to the foregoing Stipulation, IT IS HEREBY ORDERED that Plaintiff China Energy Corporation shall have up to and including Friday, June 6, 2014, in which to file its opposition to the Motion to Dismiss (Dkt. No. 212)

IT IS SO ORDERED

DATED this 22nd day of May, 2014.

A handwritten signature in blue ink, consisting of a stylized 'N' followed by a circular flourish and a horizontal line extending to the right.

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

The undersigned, an employee of Gordon Silver, hereby certifies that she served a copy of
STIPULATION TO EXTEND TIME via CM/ECF on May 22, 2014 to the following
individuals:

Richard L. Elmore, Esq.
Holland & Hart
5441 Kietzke Lane, 2nd Floor
Reno, NV 89511
*Attorney for Thomas S. Vredevoogd,
Trustee of the Kimberly J. Vredevoogd
Trust UA 1007/2008*

Michael Sammons
15706 Seekers St
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Meredith Lees
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And by U.S. Mail, postage prepaid, to the following individuals:

Elena Sammons
15706 Seekers St
San Antonio, TX 78255
Defendant in Proper Person

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4000 Goff Road
Aynor, SC 29551
Defendant in Proper Person

Jun He
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An employee of GORDON SILVER